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THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

TRISTAN HOUSE

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

vs.

14 C 7983

Judge Samuel Der-Yeghiayan  
Magistrate Judge Young B. Kim

Judge Stanley J Sacks JR

Anita Alvarez

Director S.A Godinez

(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")

CHECK ONE ONLY:

X

COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983  
U.S. Code (state, county, or municipal defendants)

COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE  
28 SECTION 1331 U.S. Code (federal defendants)

OTHER (cite statute, if known)

BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR  
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.



**I. Plaintiff(s):**

- A. Name: TRISTAN HOUSE
- B. List all aliases: \_\_\_\_\_
- C. Prisoner identification number: R65351
- D. Place of present confinement: ET. MOLINE CORR. CENTER
- E. Address: \_\_\_\_\_

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: JUDGE STANLEY SACKS JR.  
Title: JUDGE  
2600 S. CALIFORNIA AV., CHICAGO, IL.  
Place of Employment: COOK COUNTY CRIMINAL COURT
- B. Defendant: ANITA ALVAREZ  
Title: STATE'S ATTORNEY OF COOK COUNTY  
Place of Employment: 2600 S. CALIFORNIA AV., CHICAGO, IL.
- C. Defendant: DIRECTOR S.A. GODINEZ  
ILLINOIS  
Title: DIRECTOR FOR DEPT. OF CORRECTIONS.  
Place of Employment: IDOC, 1301 CONCORDIA COURT, SPRINGFIELD, IL.

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)



III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

A. Name of case and docket number: N/A

B. Approximate date of filing lawsuit: N/A

C. List all plaintiffs (if you had co-plaintiffs), including any aliases: N/A

D. List all defendants: N/A

E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): N/A

F. Name of judge to whom case was assigned: N/A

G. Basic claim made: N/A

H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): N/A

I. Approximate date of disposition: N/A

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.



IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

PLAINTIFF, TRISTAN HOUSE, BRING THIS  
42 U.S.C. 1983 CIVIL RIGHTS COMPLAINT CONTENDING  
THAT THE COOK COUNTY CRIMINAL COURT VIOLATED HIS  
FOURTEENTH AMENDMENT RIGHT TO THE UNITED STATES  
CONSTITUTION ("DUE PROCESS OR FAIRNESS"). PLAINTIFF WAS  
GIVEN A PLEA BARGAIN FOR "BOOT CAMP". PLAINTIFF CON-  
TINUE TO BE DENIED "BOOT CAMP".

DUE PROCESS

"BOOT CAMP"

PLAINTIFF TRISTAN HOUSE WAS  
CHARGED WITH THE OFFENSE OF DELIVERY OF 4-GRAMS  
OF HEROIN TO UNDERCOVER AGENCY. A OFFER WAS  
TENDER TO PLAINTIFF. THE AGREEMENT WAS THAT PLAINTIFF  
WOULD PERFORM 4-MONTHS BOOT CAMP AND 2-YEARS  
(MSR) MANDATORY SUPERVISED RELEASE. ON AUG. 12, 2013, I  
ACCEPTED THE AGREEMENT BY PLEADING GUILTY TO  
4-MONTHS BOOT CAMP AND 2-YEARS MSR.



STATEVILLE CORR. CENTER

PLAINTIFF WAS TRANSFERRED FROM  
THE COOK COUNTY JAIL TO STATEVILLE CORR. CENTER ON  
AUG. 14, 2013. AFTER PLAINTIFF WAS PROCESSED, I  
WAS EVENTUALLY TRANSFERRED TO STATEVILLE GYM ROOM  
(H-2). PLAINTIFF WOULD REMAIN IN THE GYM-ROOM  
FOR APPROX. 2-MONTHS. DURING THAT TIME PLAINTIFF  
BECAME DEPRESSED. THE GYM-ROOM WAS CONVERTED  
INTO A LIVING-QUARTER FOR BOOT CAMPERS WHILE  
THEY WAIT TO BE TRANSFERRED.

THE GYM-ROOM WAS OVERCROWDED. THERE  
WAS ONLY TWO-BATHROOM FOR A HUNDRETH INMATES  
OR MORE. THE LIVING CONDITIONS BECAME UNBARABLE.  
PLAINTIFF <sup>WROTE</sup> THE COUNSELOR AND ASKED HER WHY  
WAS IT TAKING THEM SO LONG TO TRANSFER ME.  
THE COUNSELOR WROTE ME BACK STATING THAT  
THE IDOC WAS WAITING ON BED SPACE. <sup>" "</sup>SEE EXHIBIT 2.

ON OCT. 4, 2014, I WAS TOLD TO PACK-UP  
TO BE TRANSFERRED FROM STATEVILLE. PLAINTIFF WAS UNDER  
THE MISGUIDED IMPRESSION THAT I WAS BEING TRANS-  
FERRED TO <sup>" "</sup>BOOT CAMP." THE NEXT MORNING PLAINTIFF  
LEARNED THAT HE WAS BEING TRANSFERRED TO DIXON.



## DIXON CORR. CENTER

WHEN PLAINTIFF ARRIVED AT DIXON CORR. CENTER, PLAINTIFF IMMEDIATELY WROTE THE COUNSELOR TO DETERMINE WHAT PROMPTED THEM TO TRANSFER ME TO DIXON AND NOT BOOT CAMP. THE COUNSELOR WROTE ME BACK. IN HIS LETTER HE STATED ~~THAT~~ I WAS SUPPOSE TO BE AT BOOT CAMP, BUT THE IDOC HAD CHANGED THEIR PLANS SEE EXHIBIT 7. THEREFORE, DIXON WAS UNDER THE IMPRESSION THAT I SHOULD HAVE BEEN AT "BOOT CAMP."

## COOK COUNTY COURT

FOR A LONG TIME PLAINTIFF WAS UNDER STRESS. THE STRESS WAS CREATED BY THE ASSUMPTION THAT I SHOULD BE AT BOOT CAMP. (P)URRELLING WITH DIXON WAS GETTING ME NOWHERE. SO, I FILED A MOTION TO WITHDRAW GUILTY PLEA AND VACATE SENTENCE. IN MY PETITION, I EXPLAINED TO THE COURT THE NATURE OF OUR AGREEMENT. THAT THE 4-MONTHS BOOT CAMP AND TWO-YEARS MSR WAS PRECIPITATED ONLY BY MY PLEA AGREEMENT.

THE COURT SENT ME A LETTER STATING THAT MY MOTION WAS DENIED. PLAINTIFF CANNOT UNDERSTAND THE STATE-COURT. BY NO MEANS WAS THE AGREEMENT VALUE. THE STATE AS WELL AS THE JUDGE KNEW OR SHOULD HAVE KNOWN WHAT IT WAS DOING.



V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

PLAINTIFF SEEKS A DECLARATION CALLING THE  
STATE COURT BEHAVIOR UNCONSTITUTIONAL AND  
VIOLATIVE OF THE FOURTEENTH AMENDMENT TO THE U.S.  
CONSTITUTION. PLAINTIFF SEEKS 200,000 IN  
COMPENSATORY DAMAGES. PLAINTIFF ASK THAT HE BE  
IMMEDIATELY RELEASED.

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_

\_\_\_\_\_  
(Signature of plaintiff or plaintiffs)

\_\_\_\_\_  
(Print name)

\_\_\_\_\_  
(I.D. Number)

\_\_\_\_\_  
(Address)



ILLINOIS DEPARTMENT OF CORRECTIONS

Offender Request

Offender Name: Tristan House ID #: R65351 Living Unit: 31/26

Please refer to the directory located in your orientation manual and address proper personnel.

To: My COUNSLOR

I request ☐ interview ☐ cell assignment ☐ visit ☐ banking ☐ purchase ☐ other (specify) How you Do in  
for the purpose of (explain): I came to DIXON ON 10-4-13 but I suppose to be  
going to boot camp I was approved with no Holds I would like  
To know my status where I stand. I came from stateville, Thank Yo  
Tristan House 10-8-13  
Offender's Signature Date

DO NOT WRITE BELOW THIS LINE

Remarks by staff (if necessary): You were recommended to go to Boot Camp by RTC but  
The Transfer Coordinators office sent you to Dixon cc.  
When the paperwork from this Decession catches up to us I will  
be better able to Tell you why, and if it is permense or not.  
Print Staff Name Print Supervisor Name  
Staff Signature Date Supervisor Signature Date

Distribution: Affected Unit

At Law cc 10-11-13  
Recycled Paper

DOC 0286 (Eff. 9/2005)  
(Replaces DC7177 & DC3811)

EXHIBIT 2.

ILLINOIS DEPARTMENT OF CORRECTIONS

Offender Request

Offender Name: Tristan House ID #: R65351 Living Unit: T3-A-50  
Job Assignment: \_\_\_\_\_ Shift: \_\_\_\_\_

Please refer to the directory located in your orientation manual and address proper personnel.

To: COUNSLOR

I request ☐ interview ☐ cell assignment ☐ visit ☐ Trust Fund ☐ purchase ☐ other (specify) I would like  
for the purpose of (explain): To know if I Have any holds or anything  
and if I'm approved Thank you

Offender's Signature

Date

DO NOT WRITE BELOW THIS LINE

Remarks by staff (if necessary): No holds  
You are waiting on bed space.  
Print Staff Name Print Supervisor Name  
Staff Signature Date Supervisor Signature Date

Distribution: Affected Unit

Printed on Recycled Paper

DOC 0286 (Rev. 4/2010)